

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GLOBAL GOLD MINING, LLC,

Petitioner,

vs.

PETER M. ROBINSON, AS PRESIDENT OF THE
INTERNATIONAL CHAMBER OF COMMERCE,
AN UNINCORPORATED ASSOCIATION, AND
INTERNATIONAL COURT OF ARBITRATION
OF THE INTERNATIONAL CHAMBER OF
COMMERCE, AN UNINCORPORATED
ASSOCIATION,

Respondents.

07 Civ. 10492 (GEL)

ECF CASE

ELECTRONICALLY FILED

DECLARATION OF PETER M. ROBINSON

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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Petitioner,

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DECLARATION OF PETER M. ROBINSON

PETER M. ROBINSON declares, under penalty of perjury pursuant to 28 U.S.C. § 1746,
as follows:

1. I am a citizen of the United States and reside in Fairfield, Connecticut,
United States of America.

2. I am currently employed as President and Chief Executive Officer
("CEO") of the United States Council for International Business, Inc. ("USCIB"). The only
employment positions I hold are as President and CEO of USCIB.

3. USCIB is a not-for-profit corporation organized under the laws of the
State of New York. USCIB is incorporated under Section 102 of the Not-For-Profit Corporation
Law of the State of New York.

4. I submit this affidavit in response to the Petition Under N.Y. C.P.L.R.
Article 75 filed by Global Gold Mining, LLC.

5. I am personally familiar with the matters stated below, which are set forth to the best of my recollection.

Employment and Educational History

6. I became the 15th president of USCIB in April 2005. I previously served as USCIB's Senior Vice President and Chief Operating Officer. My prior positions at USCIB included Vice President for Membership and Manager of Trade and Transport Policy.

7. I received my B.A. in International Relations and German from the University of Delaware (1977) and studied at the University of Vienna on a Rotary International Scholarship. I received my M.A. from Columbia University's School of International Affairs (1979).

USCIB

8. USCIB was founded in 1945 to promote an open world trading system and now is among the premier pro-trade, pro-market liberalization organizations in the world. USCIB addresses a broad range of policy issues with the objective of promoting an open system of world trade, finance and investment in which business can flourish and contribute to economic growth, human welfare and protection of the environment. Its membership includes some 300 leading U.S. companies, professional services firms and associations, representing all major sectors of the economy.

9. USCIB serves as the U.S. affiliate of a number of international organizations, including the International Chamber of Commerce, the International Organisation of Employers, and the Business and Industry Advisory Committee to the Organization for

Economic Cooperation and Development. Additionally, USCIB serves as the national guaranteeing and issuing association for the ATA Carnet System for duty-free imports.

The ICC and the ICC Court

10. The International Chamber of Commerce (the “ICC”) was founded in 1919 in Paris, France to further the development of an open world economy. Since its establishment in 1919, the ICC has been located in Paris.

11. The ICC International Court of Arbitration (the “ICC Court”) was established in 1923 and is located in Paris, France. The ICC Court organizes and administers arbitrations held under the ICC Rules of Arbitration. The present ICC Rules of Arbitration came into effect on January 1, 1998. The day-to-day management of arbitrations administered by the ICC Court is supported by the Secretariat of the ICC Court in Paris.

12. USCIB represents U.S. industry in the development of the ICC’s global business policy positions and trade facilitation guidelines, and promotes use of the ICC International Court of Arbitration for the settlement of commercial disputes.

13. USCIB acts as the U.S. National Committee to the ICC. As such, USCIB is one of the ICC’s 90 National Committees located all over the world. The ICC’s National Committees nominate delegates to the ICC World Council and appoint members to the ICC Court.

14. USCIB is not a subsidiary, division or agent of the ICC. The ICC is an independent organization and French legal entity.

15. USCIB has no authority to direct the administration of ICC arbitrations and plays no role in administering ICC arbitrations. Rather, it is the ICC Court and its Secretariat that administer ICC arbitrations from their offices in Paris, France.

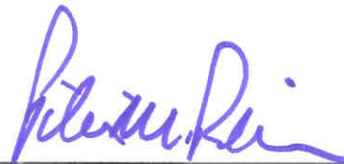
This Proceeding

16. On the afternoon of Monday, October 29, 2007, a gentleman arrived at the New York offices of USCIB, 1212 Avenue of the Americas, New York, NY 10036-1689 and asked for me. The gentleman handed me two copies of a Notice of Petition Under N.Y. C.P.L.R. Article 75, supporting Memorandum of Law, and Affirmation of Louisa B. Childs. I told the gentleman that I was not President of the ICC (as erroneously indicated in the caption of this case). The gentleman left the two copies of the Petitioner's legal papers on the table and exited the building.

17. Contrary to the statement in Petitioner's court papers, I am neither "President of the ICC" nor "United States President of the ICC." I do not represent that I am, nor do I hold myself out to be, President of the ICC or United States President of the ICC. I am not an officer or an employee of the ICC or the ICC Court.

I declare upon penalty of perjury that the foregoing is true and correct.

Dated this 27th day of November 2007


Peter M. Robinson